

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IRON WORKERS' MID-AMERICA)	
PENSION PLAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 22 C 3359
)	
WISCONSIN REBAR, INC.,)	JUDGE RONALD A. GUZMAN
a Wisconsin corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, WISCONSIN REBAR, INC., a Wisconsin corporation, in the total amount of \$12,892.65, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,706.00.

On July 20, 2022, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her residence (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on August 10, 2022. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Patrick N. Ryan

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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that I electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 19th day of August 2022:

Ms. Wendy Schmitz, Registered Agent
Wisconsin Rebar, Inc.
1019 Man Cal Road
Brillion, WI 54110-9605

Ms. Wendy Schmitz, Registered Agent
Wisconsin Rebar, Inc.
N9559 Harvestore Road
Brillion, WI 54110-9746

/s/ Patrick N. Ryan

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